

UNITED STATES DISTRICT COURT
IN THE WESTERN DISTRICT OF MICHIGAN

RONECA ECHOLS,

Plaintiff,

-vs-

CARRITE OF KALAMAZOO, D/B/A
BLACK TIE, INC., *et al.*,

Defendant.

Case No. 1:17-CV-00204-PLM-RSK
Hon. Paul L. Maloney
Magistrate Judge: Ray Kent

NOTICE OF WITHDRAWAL OF
MOTION FOR INJUNCTION AGAINST TRANSFER OF ASSETS AND FOR DEBTOR-
CREDITOR EXAM (ECF NO. 70)

The Plaintiff withdraws her Motion for Injunction Against Transfer of Assets and for Debtor-Creditor Exam (ECF No. 70).

Plaintiff served a copy of the Order Setting Debtor-Creditor Exam (ECF No. 73) (“Order”) on the Secretary of State, care of the Office of Investigative Services, 430 W. Allegan, 3rd Floor, Lansing, MI 48913 on November 29, 2018. That same day, Plaintiff mailed a copy of the Order to: 1) Black Tie, Inc., care of Steven Bailey, 16000 Force Ave., NE, Cedar Springs, MI 49139; and 2) Black Tie, Inc., care of David Brock, 5338 S. Silver Dr., NE, Comstock Park, MI 49321.

On December 5, 2018, Mr. David Brock contacted Lyngklip & Associates Consumer Law Center, PLC. He notified Plaintiff’s counsel that CARite Corporate, LLC has a Judgment against Black Tie, Inc. for in excess of Two Million U.S. Dollars (\$2,000,000.00) and that Black Tie, Inc. and its owners currently have no assets. (December 14, 2018 Declaration of David Brock, Exhibit 2)

Plaintiff has good reason to believe that this information is correct and that the judgment in this case is effectively uncollectable. As such, the pending debtor-creditor examination would constitute a waste of resources.

In light of this information, Plaintiff withdraws her Motion for Injunction Against Transfer of Assets and for Debtor-Creditor Exam (ECF No. 70), and requests that the Court and its staff not proceed with that examination.

Respectfully Submitted,

By: s/ Ian B. Lyngklip
Ian B. Lyngklip P47173
Sylvia Bolos P78715
LYNGKLIP & ASSOCIATES,
CONSUMER LAW CENTER, PLC
Attorney for Roneca Echols
24500 Northwestern Highway, Ste. 206
Southfield, MI 48075
(248) 208-8864
Ian@MichiganConsumerLaw.Com

Dated: December 19, 2018

CERTIFICATE OF SERVICE

I certify that on December 19, 2018, I will electronically file the document above with the Clerk of Court using the CM/ECF system, which will then send a notification of such filing (NEF) to the following persons:

Party	Manner
David Brock 5338 S. Silverstone Dr., NE Comstock Park, MI 49321	Via CM/ECF System

Respectfully Submitted,

By: s/ Ian B. Lyngklip
Ian B. Lyngklip P47173
Sylvia Bolos P78715
LYNGKLIP & ASSOCIATES,
CONSUMER LAW CENTER, PLC
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Dated: December 19, 2018